



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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MAY 15 2001

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4WD-RPB

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

Subject: Notice of Technical Inadequacy (NOTI)
Grenada Manufacturing LLC
Grenada, Mississippi
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The United States Environmental Protection Agency (EPA) and the Mississippi Department of Environmental Quality have completed their review of the Closure Work Plan for SWMU 14, Chromium Destruct Pit, dated March 15, 2001. The Closure Work Plan is part of interim measures being implemented by the facility. EPA is transmitting its comments on the document, both general and specific. These comments must be addressed in a revision of Closure Work Plan. The revision of the Closure Work Plan will be due 60 days after receipt of this NOTI by the facility.

EPA's letter dated December 13, 2000 stated that the Closure Plan for the Chromium Destruct Pit should follow 40 CFR Part 264 Subpart G requirements [Surface Impoundments]. The Closure plan that the facility sent followed Subpart J requirements [Tanks]. The Destruct Pit does not meet the definition of a Tank at 40 CFR Part 260.10, therefore, the Closure Plan as submitted is unacceptable.

Please find attached, EPA's comments on the Closure Work Plan for SWMU 14, Chromium Destruct Pit. If you have any questions, please call Donald Webster of my staff at (404) 562-8469.

Sincerely,

Narindar M. Kumar, Chief
RCRA Programs Branch
Waste Management Division

Enclosure

cc: Louis Crawford, Mississippi DEQ

Docket Number 450863

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NOTI: Grenada Manufacturing: SWMU 14 Chromium Destruct Pit, Closure Plan

1. EPA's letter dated December 13, 2000 stated that the Closure Plan for the Chromium Destruct Pit should follow 40 CFR Part 264 Subpart G requirements [Surface Impoundments]. The Closure plan that the facility sent followed Subpart J requirements [Tanks]. The Destruct Pit does not meet the definition of a Tank at 40 CFR Part 260.10, therefore, the Closure Plan as submitted is unacceptable. EPA would like the facility to follow the rules for surface impoundments when closing SWMU 14. We feel that technically, these are more appropriate for the Chromium Destruct Pit as a SWMU.
2. EPA has not yet determined whether or not the chromium acid baths on the former production line meet the definition of a tank. The acid baths appear to be above ground, open top tanks. If a release from the chromium acid baths is documented, then EPA will determine whether they need to be closed as a tank or a surface impoundment. In EPA's preliminary view, they appear to meet the definition of a tank. If true, the facility's closure plan may need to provide for two types of closure; one under Subpart G and possibly another under Subpart J.
3. In general the facility's closure plan does not present sufficient detail for the removal of a substance that is both characteristic and acutely toxic. Specific comments follow.
4. There must be a grid-like sampling plan for soil at various depths around and under the Chromium Destruct Pit, the acid baths, and any associated lines. The plan should include corings and testing to Industrial Risk Based Concentrations for total Chromium and Chromium VI.
5. There should be a figure in the closure plan depicting the Chromium Destruct Pit, the acid baths, and any associated lines. Planned sampling locations should be depicted on the figure.
6. The closure plan, as written, does not identify the level of protective equipment for decontamination workers.
7. Page 3. #5: Visual examination alone of the inside surface of the Chromium Destruct Pit will not be sufficient to determine if further sampling will be necessary. Given the high levels of chromium contamination already demonstrated at the plant, it is unlikely that even integrity testing alone will be sufficient to document release or non-release.
8. There should be integrity testing of the underground piping, such as hydrostatic testing, to ensure that no breaks have existed, before the pipe is grouted. Neither soil testing nor removal of the lines and surrounding soil should be ruled out.
9. Page 4. #6 & #10: Soil or Concrete may not be proper caps for closure of a surface impoundment. No backfilling or cementing should be conducted until all sampling, testing, removal and/or remediation is completed under an approved closure plan. Any cap must meet the requirements of 40 CFR Part 264 Subpart G and 40 CFR Part 264.228.

12/13/01

10. It is stated that the pit will be cleaned by scraping and rinsing, and sampling of rinsate will be used to verify 'clean'. This procedure may be sufficient for decontamination of tanks or equipment, but not for decontamination of the Chromium Destruct Pit.

11. EPA estimates that at least 250, 55gallon drums of chromium acid waste will be generated from closure of the Chromium Destruct Pit, perhaps double that amount when the production lines and rinsing and decontamination are considered. An estimate of the quantity of waste generated needs to be made in the revised closure plan.

12. In the case of the Chromium Destruct Pit, EPA envisions that Closure Certification would follow the guidelines of 40 CFR Part 264.115.

13. Page 2: "...pit is about 3-2-feet from...". What is the correct distance of the Chromium Destruct Pit from the Main Building?

14. When was the roof constructed over the Chromium Destruct Pit? Was there ever an overflow of the Chromium Destruct Pit due to rainfall before the roof was constructed? If so, testing for this possible source of contamination should be incorporated into the sampling design.

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